

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

STEPHANIE PRICE, ET AL.,

Plaintiffs,

vs.

NEW HAMPSHIRE DEPARTMENT OF  
HEALTH AND HUMAN SERVICES,  
COMMISSIONER, ET AL.,

Defendants.

Case No. 21-cv-25-PB

**JOINT MOTION TO EXTEND CLASS CERTIFICATION BRIEFING SCHEDULE**

Pursuant to Local Rule 7.1, the Parties, by and through their undersigned counsel, respectfully move this Court to 1) extend the time for Plaintiffs to file their Motion for Class Certification until August 28, 2022 and 2) allow Defendants an extended time, until September 27, 2022, to file their Objection to Class Certification. In support of this motion, the Parties state as follows:

1. The court-ordered Discovery Plan provides that:

As this action is a putative class action, the Court will need to set a deadline for submission of class certification briefs. Plaintiffs propose that the Court set a deadline of June 28, 2022 for filing of class certification briefs, with objection and reply deadlines to follow as set forth in the Local Rules.

(ECF No. 32 at 7).

2. The parties are in the midst of intensive discovery efforts. Counsel are meeting and conferring regularly to try to resolve disputes by agreement.
3. Although the parties are not seeking to extend discovery deadlines in this case, they jointly request additional time to prepare their class certification briefing.

4. Pursuant to Local Rule 7.1(c), all Parties assent to the request for relief set forth in this motion.

5. Pursuant to Local Rule 7.1(a)(2), no memorandum of law accompanies this motion, as the relief sought herein is within the sound discretion of this Court.

WHEREFORE, the Parties respectfully request that this Court:

- A. Extend the deadline for Plaintiffs to file their class certification motion and brief until August 28, 2022;
- B. Extend the deadline for Defendants to file their objection to class certification and supporting brief until September 27, 2022; and
- C. Grant such other and further relief as justice requires.

Respectfully submitted,

STEPHANIE PRICE, EMILY  
FITZMORRIS, and KATHLEEN BATES,  
on behalf of themselves and all others  
similarly situated,

By Their Attorneys,

Dated: May 25, 2022

/s/ Kay E. Drought

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Respectfully submitted,  
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Services and Commissioner Lori Shibinette in her  
Official Capacity,  
By their attorneys,  
JOHN FORMELLA,  
THE OFFICE OF THE ATTORNEY GENERAL

Dated: May 25, 2022

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